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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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November 30, 1998

Mr. George Sanders  
U.S. Department of Energy  
P.O. Box 550, MSIN: A5-15  
Richland, WA 99352



Dear Mr. Sanders:

Re: Ecology's Response to the U.S. Department of Energy (USDOE) Recommendations  
on New Tanks Pursuant to M-46-01E

The Washington State Department of Ecology (Ecology) has completed its review of the latest version of the *Operational Waste Volume Projection (OWVP)*, HNF-SD-WM-ER-029, Rev. 24. This projection brings new urgency to the decision on building new tank space capacity at Hanford. Under any projection that includes single shell tank (SST) waste retrieval, new tank capacity is required within the time frame of the projection, with additional capacity likely needed beyond the projected time frame.

The OWVP itself has serious shortcomings in the assumptions used for the projections, in that none of the scenarios used accurately reflect the actual site planning or the requirements of the Hanford Federal Facility Agreement and Consent Order (Consent Order). Ecology understands that the major impacts to the waste volume projection were undergoing major revisions during the creation of this projection. These major impacts include treatment capacity and timing, SST interim stabilization liquid volume and timing, and C-106 waste retrieval volume and timing. A new analysis needs to be conducted and should reflect site planning, Consent Order requirements, retrieval of C-106 in late 1998/early 1999 and subsequent SST waste retrieval in compliance with the M-45 milestones, interim stabilization liquids of up to 7 million gallons complete in 2004, and treatment capacity available in 2006.

Current projections show that available tank space is exceeded in the 2004 to 2006 time frame. With no firm commitment to date from USDOE to obtain tank waste treatment capacity, even these projections may underestimate the need for new tank space. Given the 6-8 years required for the new double shell tank capacity to become available, a decision must be made almost immediately to build new tank space in order for the Hanford site to fulfill its mission of waste retrieval and treatment.



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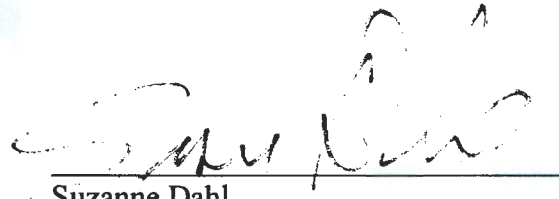
As currently written, the OWVP would require USDOE to begin the process of acquiring new tank capacity. Since this action is a major decision for the Tank Waste Remediation System (TWRS) program, we suggest that the OWVP be re-calculated using the latest information from the various elements of the program, and be resubmitted to Ecology by January 31, 1999. Ecology and USDOE can then review the new projection, which will be more accurate and meaningful, and consider the need for new tanks by March 31, 1999. If the data continue to show the need for new tank space for Hanford to fulfill its TWRS mission, creation of new milestones for tank construction will occur at that time, in accordance with milestone M-46-01E.

If this is acceptable to you, please respond in writing to us no later than December 16, 1998.

Sincerely,



Tony Valero  
TWRS Storage Project Manager  
Nuclear Waste Program



Suzanne Dahl  
TWRS Disposal Project Manager  
Nuclear Waste Program

TV:SD:sb

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Administrative Record: TWRS - OWVP